

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA, :

Plaintiff, : Case No. 2:21-CR-157

vs. : JUDGE WATSON

IBN MUHAMMAD :

Defendant. :

DEFENSE'S MOTION TO REOPEN DETENTION

Pursuant to 18 U.S.C. §3142(f), Defendant Ibn Muhammad hereby respectfully requests a hearing to reopen the issue detention. Defendant submits that new and material information exists that was not known at the time of the first hearing and supports the determination that there are conditions of release that will reasonably assure Defendant's appearance and safety of the community. Mr. Muhammad waived his right to a detention hearing at the initial appearance. However, the right to reopen was preserved as outlined in the Order of Detention Pending Trial, Doc #16.

Respectfully submitted,

DEBORAH L. WILLIAMS
FEDERAL PUBLIC DEFENDER

/s/ George Chaney, Jr.
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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ George Chaney Jr.
George Chaney, Jr.